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February 12, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

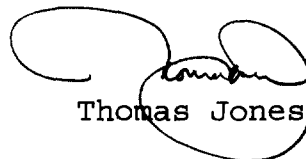
Re: Ex Parte Presentation in CC Docket 95-116/ RM 8535
Telephone Number Portability

Dear Secretary Caton:

On Monday, February 12, 1996, representatives of Time Warner Communications ("TWComm") met with Matthew Harthun, Attorney Advisor, Jason Karp, Attorney Advisor, Geannie Su, Attorney Advisor, and Susan McMaster, Industry Economist of the Common Carrier Bureau. Representing TWComm were Don Shephard, Carol Melton, Sue Blumenfeld, and Thomas Jones. Attached are two copies of two outlines which describe the substance of TWComm's presentation and which were submitted at today's meeting.

Please let me know if you have any questions.

Sincerely,



Thomas Jones

Enclosures

cc: Matthew Harthun
Jason Karp
Geannie Su
Susan McMaster

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List ABCDE

Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036-3384
202 328 8000

Telex: RCA 229800
WU 89-2762
Fax: 202 887 8979

Original Time Warner Reply Comments

- Time is of the essence
- Longer term solutions are available in near term
- Multiple longer term solutions can coexist
 - there was no one dominant solution
 - appeared that certain solutions favored certain networks
 - multiple solutions allowed flexibility and fast deployment
- LEC should deploy LNP within 6 months of bona fide request

What Time Warner Sees Now

- LNP has made a quantum leap with LRN
- ICC work will have ironed out technical/procedural issues
- LRN will be Generally Available 7/1/97
 - AT&T (5ESS, 1AESS, 4ESS) Ericsson (AXE-10)
 - Nortel (DMS-100, DMS-250) Siemens (EWSD)
- It should take less than 1 year to deploy LRN, including
 - agreements on operational procedures
 - establishment of neutral 3rd party SMS provider
- There's no reason to re-invent the wheel
 - world's best experts developed LRN requirements & procedures
 - other coexisting solutions are fine, but they should not delay

Current ICC Status

- 9/95 - LRN chosen as a solution
- 11/95 - Switch vendors commit to 1H97 Deployment
- 1/96 - Operator Services Requirements Final
- 1/96 - Carriers Sign Stipulation, committing to LRN
- 2/96 - SMS RFP Released
- 2/96 - Switching & SCP Requirements Final
- 4/96 - SMS Vendor Selected
- 12/96 - Operations Requirements Final
 - Provisioning 2Q96, Maintenance 3Q96, other 4Q96
- 1H97 - LRN Testing
- 7/1/97 - LRN ringing phones in Chicago MSA-1

ICC Vendor Participation

- Switching
 - AT&T, Ericsson, Nortel, Siemens
- STP
 - AT&T, DSC, Ericsson
- SCP
 - AT&T, Bellcore, DSC, Ericsson, HP, Tandem
- SMS
 - Andersen, Evolving Systems, HP, U. S. Intelco, ...

State Activity

State	Technnology	Notes
Arizona		just starting
California	LRN	RTP to coexist with LRN
Colorado	LRN	97 deployment
Connecticut		just starting
Georgia	LRN	3Q97 deployment
Illinois	LRN	3Q97 deployment, 4/96 SMS vendor selection
Maryland	LRN	3/97 SMS RFP release
New York	LRN	initial CPC trial
Oregon		just starting
Texas		just starting
Washington		technology selection 2/96

Chicago MSA-1 LEC Cost Study

- Conservative Assumptions
 - 5 year study - Ameritech loses 25% subscribers by year 5
 - 1050 NXXs over 234 Ameritech switches
 - LRN implementation (N-1, no queries for intra-switch calls, etc.)
 - \$6M SCP mated pair processes 800 calls per second
 - 500 staff years for Ameritech Operational Support System Development (MSA-1 share of full 5 state costs)
 - \$35M switch and \$15M SS7 upgrades for MSA-1
- Results
 - Ameritech MSA-1 NPV 5 year costs = \$138M
 - Ameritech MSA-1 cost/line/year = \$3.54
 - Ameritech MSA-1 cost/line/month = 29 cents

Inter-Operability Issues

- It'd be nice if everyone deployed LRN in 1997, but...
- PacBell wants to deploy Release To Pivot (RTP)
 - they claim RTP compatibility with LRN
 - this appears to work, but no analysis has been done
- Time Warner believes multiple solutions can coexist if:
 - N-1 triggering approach is used by all
 - SS7 signaling compatibility (common use of ISUP parameters)
 - bilateral agreements for vacant code treatment, etc.
- Inter-Operability appears to be more an issue with Location Portability
- ICC work on Location Portability should help raise issues

INC Number Portability Status

- 1993 - Mission Statement
- 1994 - Contributions
- 1995 - First Number Portability Report Draft 4/95
- 1996 - Number Portability Report Still in Draft form
 - draft only contains issues
 - no solutions
 - no recommendations

2/12/96

**TIME WARNER COMMUNICATIONS
EX PARTE PRESENTATION RE/NUMBER PORTABILITY**

**Regulatory Issues
(CC Docket No. 95-116)**

- Focus of FCC policy should be on insuring rapid implementation of Service Provider Portability, as a key element in promoting true, facilities-based competition in the local loop.
- Passage of 1996 Telecom Act reinforces the need for and feasibility of the FCC assuming a strong leadership role in driving implementation of true, database number portability by individual LECs.
- Appropriate role of FCC at this time is not to specify a particular technological solution, but to put in place a process with appropriate incentives and penalties to ensure that service provider portability is achieved in an orderly and expeditious manner.

- Essential elements of FCC Service Provider Portability Policy
 - establishment of baseline generic functional criteria which all LEC service provider portability solutions must satisfy
 - establishment of deadline for initial implementation of service provider portability
 - establishment of a schedule and process for development and approval of LEC number portability plans
 - adoption of rules which require LECs to provide CLECs with a range of "interim" number portability solutions (i.e., RCF, DID, enhanced DID) free of charge
 - adoption of simple, fair and efficient rules for the allocation of costs associated with implementation of true number portability, as described in TWComm's Comments
 - establishment of strong compliance incentives and enforcement mechanisms

- Proposed Portability Planning/Implementation Process
 - FCC establishes firm deadlines for submission and approval of LEC plans and IXC plans for implementation of true number portability
 - LECs and IXCs required to consult/negotiate with CLECs and other interested parties (e.g., IXCs, vendors, states) in developing plans
 - Plans must be consistent with FCC standards and any state number portability requirements (to the extent they are not inconsistent with the federal scheme)
 - Plans should establish initial rollout schedule, as well as procedure for implementing number portability in other areas, as CLECs expand geographic scope of their operations
 - FCC to resolve any disputes with respect to specific aspects of plans
 - Approval of plans conditioned on LEC and IXC compliance with rollout schedule specified in plan
 - Other LEC relief predicated on removal of barriers to competition in local services (e.g., BOC in-region interLATA entry) should also be conditioned on continued compliance with portability plans and FCC rules